



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

GK/KCB/DEL/NG/SMF
F. #2018R01401

271 Cadman Plaza East
Brooklyn, New York 11201

January 7, 2025

By E-mail and ECF

Jennifer Ann Bonjean
Bonjean Law Group, PLLC
303 Van Brunt Street
1st Floor
Brooklyn, New York 11231
(718) 875-1850

Counsel for Nicole Daedone

Imran H. Ansari, Esq.
Arthur L. Aidala, Esq
Aidala, Berutna & Kamins PC
546 Fifth Avenue, 6th Floor
New York, New York 10036
(212) 486-0011

Counsel for Rachel Cherwitz

Re: United States v. Rachel Cherwitz and Nicole Daedone
Criminal Docket No. 23-146 (DG)

Dear Counsel:

Enclosed please find a supplemental production pursuant to the Court's order under Federal Rule of Evidence 502(d), entered on December 23, 2024 (the "502(d) Order"). ECF Dkt. No. 240. In accordance with the 502(d) Order, disclosure of the materials enclosed herein does not operate as a waiver of any applicable attorney-client privilege or work product protection. This material is being produced to you pursuant to the revised Protective Order in the above-captioned matter, entered on November 15, 2024, and is designated as Attorney's Eyes Only. ECF Dkt. No. 207.

Specifically, please find enclosed documents recovered from a hard drive provided by Individual #10, which were subject to a judicially-authorized seizure and which had been subsequently screened for potential privilege, Bates numbered CHERWITZ-FIREWALL-000001 - CHERWITZ-FIREWALL-020578.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/
Gillian Kassner
Kayla Bensing
Devon Lash
Nina Gupta
Sean Fern
Assistant U.S. Attorneys
(718) 254-7000

cc: Clerk of the Court (DG) (by ECF) (without enclosures)